



4. On January 12, 2013 at 1:41 a.m., Plaintiff emailed Equifax's counsel and included a copy of the Requests for Admission.

5. Plaintiff never served a copy of the Requests for Admission upon Equifax by regular mail and Equifax never agreed to accept service of the Requests by email.

6. Plaintiff made no effort to meet and confer with Equifax or its counsel, as required by the Federal Rules of Civil Procedure and the Local Rules of this Court, prior to filing the Motion.

Pursuant to 28 U.S.C. §1746, I further declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of March, 2013, at Atlanta, Georgia.

By: /s/ Brian J. Olson  
Brian J. Olson